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Attorneys for Dr. John Zhang MD, MSc, PhD

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ZHANG MEDICAL, P.C. d/b/a NEW
HOPE FERTILITY CENTER

Debtor-in-Possession

Case No. 23-10678-pb

Chapter 11

(Subchapter V)

**NOTICE OF APPEARANCE AND
DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that pursuant to section 1109(b) of title 11, United States Code, section 101 *et seq.*, and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears as of counsel to Dr. John Zhang and requests service of all notices and documents herein upon:

Eric S. Medina, Esq.
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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in

the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any applications, motions, petitions, complaints, demands, disclosure statements, or plans of reorganization transmitted or conveyed by mail delivery, ECF, telephone, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers (this “Notice”) nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to a trial by jury in any proceeding related to this Chapter 11 case or any case, controversy, or proceeding related to this Chapter 11 case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: New York, New York
June 28, 2023

Respectfully submitted,

/s/ Eric S. Medina, Esq.

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